

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PRUDENTIAL EQUITY GROUP, LLC

Plaintiff,

v.

THOMAS R. AJAMIE, AJAMIE LLP, ROBERT
WEISS, ROBERT H. WEISS & ASSOCIATES,
LLP, JOHN MOSCOW, ROSNER NAPIERALA,
LLP, BRIAN ROSNER, DAVID ROBBINS,
KAUFMANN FEINDER YAMIN GILDIN &
ROBBINS, LLP, WALLACE SHOWMAN,
BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP, ROBERT KRAUS, KRAUS :
& ZUCHLEWSKI LLP, MARTIN KROLL and
KROLL, MOSS & KROLL LLP

Defendants.
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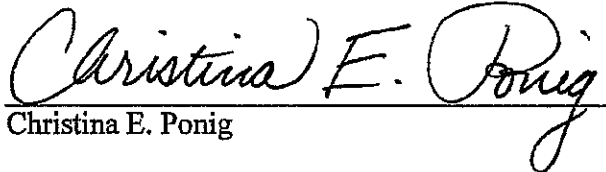
07 CV 5606 (JSR)

**DECLARATION OF
CHRISTINA E. PONIG**

1. My name is Christina E. Ponig. I am an associate with Bracewell & Giuliani LLP. I am associated with Ileana M. Blanco, a member of Bracewell & Giuliani LLP.
2. On or about May 31, 2007, Prudential Equity Group ("PEG") learned that Thomas R. Ajamie and Ajamie LLP (collectively "Ajamie") had sought and obtained in state court in Houston, Harris County, Texas an *ex parte* Temporary Restraining Order ("TRO") against PEG. The purpose of the TRO was to prohibit PEG from instituting an interpleader action regarding the Disputed Fund in the above-referenced action. Ajamie obtained this TRO before serving PEG with the lawsuit. PEG subsequently retained Ms. Blanco to defend PEG in the Texas action.
3. Ms. Blanco and I began working on the case immediately. Over the course of only a few days, we analyzed substantial amounts of Texas and federal case law on anti-suit injunctions, federal interpleader actions, and temporary restraining orders under Texas law. In addition, we had numerous internal conferences and conferences with the client and co-counsel. Specifically, we needed to work closely with David Picon and Karen Coombs of Proskauer Rose LLP in order to learn the facts and background of the case quickly. We prepared and filed two motions to dissolve the TRO on an expedited basis

and prepared for two emergency hearings on those motions. PEG ultimately prevailed, and the TRO was dissolved.

4. Bracewell & Giuliani LLP's fees and disbursements for this work totaled \$25,052.50. Attached as Exhibit 1 to this Declaration is the fee detail supporting this amount, which I have redacted as appropriate to preserve privileged communications and work product.
5. Ms. Blanco is a highly qualified attorney with a distinguished record. She graduated with highest honors from the University of Miami in 1981 and with honors from Georgetown University Law Center in 1984. She was subsequently admitted to the Texas bar. She is also a member of the New York State Bar and has been admitted to practice in various federal courts, including the U.S. Supreme Court. She is chair of Bracewell & Giuliani's lender liability litigation practice and has over 20 years in civil and commercial litigation, including extensive trial, appellate, and dispute resolution experience.
6. I graduated in 1997 with honors from Duke University and received my law degree in 2003 from the University of Texas School of Law. I am a member of the State Bar of Texas and am admitted to practice in the Southern District of Texas. I joined Bracewell & Giuliani LLP in September 2005 after clerking for the United States District Court for the Southern District of Texas.
7. Ms. Blanco's billing rate is \$525.00 per hour. My billing rate is \$260.00 per hour. The fees charged for our work are in accordance with fees charged by similar attorneys at similar firms in Houston, Texas for the type of work involved in the defense of PEG in the Texas action.
8. I declare under penalty of perjury that the foregoing is true and correct.


Christina E. Ponig